

**SILVERMAN** | ATTORNEYS  
&ASSOCIATES | AT LAW

January 10, 2025

**VIA ECF**

Hon. Victoria Reznik, U.S.M.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *Reese & Terlecky v. Tuxedo Union Free School District*  
Docket No.: 23-cv-09442(VR)

Dear Judge Reznik,

We represent the Defendant in the above-referenced matter. In accordance with Your Honor's December 17, 2024 Order (ECF No. 40), we respectfully submit this joint status report on behalf of the parties to apprise Your Honor as to the status of discovery in this matter.

The parties have conferred and have agreed to conduct the depositions of the Board members on January 24<sup>th</sup>, 28<sup>th</sup>, and 30<sup>th</sup>. As discussed during our last conference with Your Honor, Plaintiff also intends on deposing Jeffrey White, the Superintendent of Schools, who remains on medical leave. The undersigned is in contact with Mr. White and is working on securing a date for Mr. White's deposition; however, it is not clear whether he will be available before the current discovery deadline. As such, the parties respectfully request an extension of the discovery deadline from January 31, 2025 to February 28, 2025 so that we may have additional time to produce Mr. White for his deposition, as well as to respond to any post-deposition demands that may be served.

We thank the Court for its time and consideration of our request.

Respectfully Submitted,

**SILVERMAN & ASSOCIATES**

By:   
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cc: All Counsel of Record (VIA ECF)

The parties' request to extend the ultimate discovery deadline is **GRANTED**. The new deadline is now February 28, 2025. Additionally, the parties are directed to file a new joint letter by no later than February 28, 2025. The letter should update the Court on the status of Mr. White's deposition, what discovery has been completed, and what still remains.

SO ORDERED.  
  
Hon. Victoria Reznik, U.S.M.J.  
Dated: 1-13-25